PATENT APPLICATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re application of	Docket No: A8643
SUN, Yudong	
Appln. No.: 09/512,560	Group Art Unit: 2178
Confirmation No.: 6032	Examiner: Basehoar, Adam L.
Filed: February 24, 2000	

For: SERVER-SIDE HTML CUSTOMIZATION BASED ON STYLE SHEETS AND TARGET DEVICE

SUBMISSION OF APPEAL BRIEF

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Submitted herewith please find an Appeal Brief. A check for the statutory fee of $500.00

is attached. The USPTO is directed and authorized to charge all required fees, except for the

Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account. A duplicate copy of this paper is attached.

Respectfully submitted,

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WASHINGTON OFFICE
23373
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Date: March 20, 2006

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APPEAL BRIEF UNDER 37 C.F.R. § 41.37

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Alexandria, VA 22313-1450

Sir:

In accordance with the provisions of 37 C.F.R. § 41.37, Appellant submits the following:

I. REAL PARTY IN INTEREST

The real party in interest is INTERNATIONAL BUSINESS MACHINES

CORPORATION by virtue of an assignment executed by Yudong Sun (Appellant, hereafter), on

February 16, 2000.

II. RELATED APPEALS AND INTERFERENCES

To the best of the knowledge and belief of Appellant, the Assignee and the undersigned,

there are no other appeals or interferences before the Board of Appeals and Interferences ("the

Board") that will directly affect or be affected by the Board's decision in the present Appeal.[2]

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[2] A previous Appeal Brief was filed in the present application on September 21, 2004. In response to
filing that previous Appeal Brief, the Examiner reopened prosecution.

III. <u>STATUS OF CLAIMS</u>

Claims 1-30 are all the claims pending in the application and are the claims on appeal

herein.

Claim 11 is rejected under 35 U.S.C. § 101 as being directed to non-statutory subject

matter.

Claims 1-30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over W3C's

"Introduction to CSS2," (http://www.w3.org/TR/REC-CSS2/intro.html#processing-model;

hereinafter *"Intro to CSS2"*) in view of *Traughber et al.* (WO 98/14896, hereinafter

"Traughber").

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

STATUS OF AMENDMENTS

A *Response Under 37 C.F.R. § 1.116* was filed on October 24, 2005, in response to the

final *Office Action* dated August 24, 2005. No amendment was filed subsequent to the final

rejection.

IV. SUMMARY OF THE CLAIMED SUBJECT MATTER

(V)(1) General Description

Appellant's invention is directed to a system and method for the server-side

customization of an HTML document for viewing on a target device based upon style sheets.

(V)(II) Relevant Technology

Web browsers can retrieve and display documents that are stored on web servers. These

documents are generally authored in hypertext markup language ("HTML"). *See* App., pg. 1.

In addition to personal computers ("PCs"), web browsers can be provided on many types

of portable electronic devices such as a personal data assistant ("PDA") or a mobile phone.

However, since the screen size, display quality, resolution, bandwidth, etc. of these portable

devices may be less than that of a PC, the portable devices cannot display a document in the

same format that a PC can. Thus, specially modified web pages are typically required for such

portable devices. *See* App., pg. 2.

To provide such specially modified web pages, style sheets have been developed. These

style sheets set rules that define the formatting of a document, and are applied to the document

before it is displayed. The style sheets modify the appearance of a document so that it can most

easily be displayed on (for example) a particular client, such as the portable devices discussed

above. *See* App., pg. 3.

These style sheets are normally processed by the web browser, at the client side (*i.e.,* at

the PC). This is because the style sheet should be applied to a document after it has been parsed

(*i.e.,* broken up into a data tree), and web browsers generally contain parsers, as parsing is a

normal step in the display of a document. Further, web servers do not generally contain parsers,

as such elements are not required to deliver web pages to a web browser at a client. *See* App.,

pg. 4.

Unfortunately, many Web browsers do not support style sheet processing. For example,

a PDA browser typically has limited memory and a smaller CPU, which limits the amount of

processing (such as that required to apply style sheets) that the PDA may perform. *See* App., pg.

4.

(V)(III) Summary of Claimed Subject Matter

Accordingly, to ensure that properly formatted documents can be viewed on client

devices that do not support style sheet processing, style sheet processing on the server side would

be desirable, and is described below.

As a matter of example to more fully explain the invention, Appellant will describe the

server side style sheet processing system and method shown in the exemplary embodiment of the

invention, which is illustrated in FIGS. 1-8 and described in detail on pages 13-22 of the

Specification. Portions of independent claims 1, 11 and 21 that correspond to the features shown

in the exemplary embodiment are also referenced during this discussion, per USPTO

requirements. This discussion of the exemplary embodiment and the pending claims is provided

for explanatory purposes only, and is not intended to limit the scope of the claims in any way.
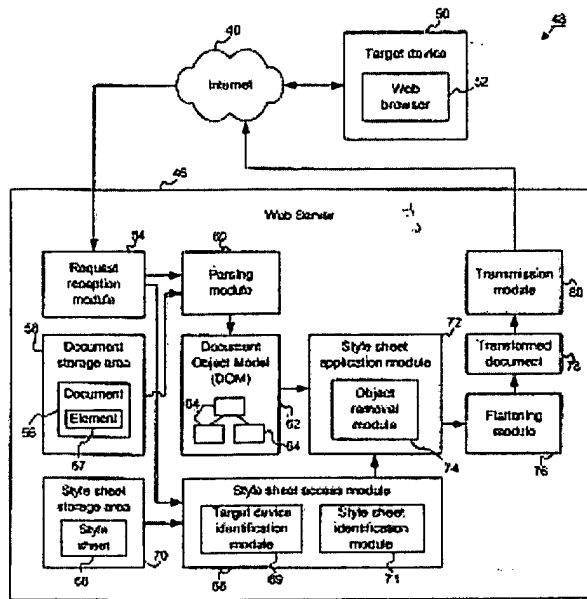
Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
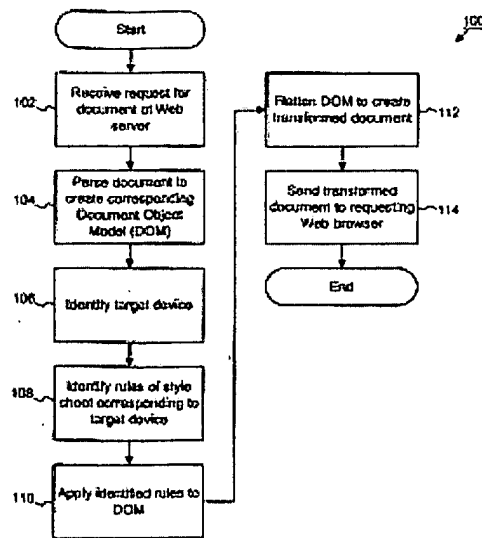ST9-99-153

Fig. 2

Fig. 3

Figure 2 illustrates a web server 46 and a target device (*i.e.,* a client) 50 with a web

browser 52. The web server 46 is configured to store and customize documents for sending to a

target device 50 via the internet 40. The following portions of the independent claims read on

this general arrangement.

Claim 1	*Claim 11*	*Claim 21*
1. Within a document server, a computer-implemented method for customizing a requested document comprising at least one hypertext markup language (HTML) element, the method comprising...	11. A system for customizing a requested document for sending to a target device comprising at least one hypertext markup language (HTML) element, the system comprising...	21. An article of manufacture comprising a program storage medium readable by a processor and embodying one or more instructions executable by the processor to perform a computer-implemented method for customizing a requested document for sending to a target device comprising at least one hypertext markup language (HTML) element, the method comprising...

Turning back to Figure 2, request reception module 54 is arranged to receive a request,

from web browser 52, for a document 56 stored in storage area 58 of the web server 46. Parsing

module 60 then retrieves document 56 and parses the document 56 to provide a Document

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

Object Model ("DOM") 62 (*i.e.*, a parse tree). See also steps 102 and 104 in Figure 3. The

following portions of the independent claims read on this arrangement.

Claim 1	*Claim 11*	*Claim 21*
... parsing the document to generate therefrom a corresponding document object model (DOM) including at least one object; ...	... a parsing module configured to parse the document to generate therefrom a corresponding document object model (DOM) including at least one object; ...	... parsing the document to generate therefrom a corresponding document object model (DOM) including at least one object; ...

Style sheet access module 66 then retrieves a style sheet 68 that includes rules to display

the document 56 on the target device 50. Target device identification module may also be

arranged in web server 46 to identify the type of target device 50. Style sheet application module

then applies the rules of style sheet 68 to DOM 62. See also steps 106, 108 and 110 of Figure 3.

The following portions of the independent claims read on this arrangement.

Claim 1	*Claim 11*	*Claim 21*
... obtaining a style sheet including at least one rule directed to a target device; applying the at least one rule of the style sheet to the DOM; and ...	... a style sheet access module configured to obtain a style sheet including at least one rule directed to the target device; a style sheet application module configured to apply the at least one rule of the style sheet to the DOM; and ...	... obtaining a style sheet including at least one rule directed to the target device; applying the at least one rule of the style sheet to the DOM; and ...

A flattening module 76 then flattens DOM 62 to generate a transformed document 78,

which may then be sent to the web browser 52 and displayed. See steps 112 and 114 of Figure 3.

The following portions of the independent claims read on this arrangement.

Claim 1	*Claim 11*	*Claim 21*
... flattening the DOM to generate therefrom a corresponding transformed document suitable for display by the target device.	... a flattening module configured to flatten the DOM to generate therefrom a corresponding transformed document suitable for display by the target device.	... flattening the DOM to generate therefrom a corresponding transformed document suitable for display by the target device.

8

V. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

1.   Whether or not claim 11 is unpatentable under 35 U.S.C. § 101 as being directed

to non-statutory subject matter.

2.   Whether or not claims 1-30 are unpatentable over *Intro to CSS2* in view of

Traughber, under 35 U.S.C. § 103(a).

VI. <u>ARGUMENTS</u>

1. Rejection Under 35 U.S.C. §101

The Examiner rejects claim 11 as being directed to non-statutory subject matter.

Specifically, the final *Office Action* states in numbered paragraph 5 the only rationale in the

Office Action for rejecting claim 11 as being directed to non-statutory subject matter:

> All the elements of the apparatus claim could be implemented in software alone
> (Specification: page 10, lines 10-12). Thus the claim is non-statutory under 35
> U.S.C. 101 as not being tangibly embodied.

Thus, the Examiner appears to assert that if the elements of the claim can be implemented

in software alone then the claim is *per se* unpatentable as being directed to non-statutory subject

matter. However, this is not the correct test.

Specifically, the test for whether a claim recites statutory subject matter under §101 is not

whether the claim can be implemented using software, but rather whether the claimed invention

produces a "useful, concrete and tangible result." *State Street Bank & Trust Co. v. Signature*

Financial Group, Inc., 149 F.3d 1368, 1373; 47 USPQ2d 1596, 1601 (Fed. Cir. 1998). The

Court of Appeals for the Federal Circuit (CAFC) in *State Street Bank* stated the following in

describing the test for whether a claim is directed to statutory subject matter:

> The dispositive inquiry is whether the claim as a whole is directed to
> statutory subject matter. It is irrelevant that a claim may contain, as part
> of the whole, subject matter which would not be patentable by itself. "A
> claim drawn to subject matter otherwise statutory does not become
> nonstatutory simply because it uses a mathematical formula, computer
> program or digital computer." *Id.* 149 F.3d at 1375, 47 USPQ2d at 1602.

In *State Street Bank*, the CAFC found that a machine that transformed data into a final

share price produced a useful, concrete and tangible result that constitutes patentable subject

matter.

Appeal Brief Under 37 C.F.R. § 41.37 (ii)
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

> [W]e hold that the transformation of data, representing discrete dollar
> amounts, by a machine through a series of mathematical calculations
> into a final share price, constitutes a practical application of a
> mathematical algorithm, formula, or calculation, because it produces "a
> useful, concrete and tangible result"--a final share price momentarily
> fixed for recording and reporting purposes and even accepted and relied
> upon by regulatory authorities and in subsequent trades.

Claim 11 in the present appeal is directed to "A system for customizing a requested

document for sending to a target device comprising at least one hypertext markup language

(HTML) element" (emphasis added). A system is not a law of nature, natural phenomena, or

abstract ideas. Accordingly, claim 11 is patentable at least because it is directed to a system.

Like the machine that was the subject in *State Street Bank*, claim 11 also transforms data.

For example, claim 11 recites "a flattening module configured to flatten the DOM to generate

therefrom a corresponding transformed document suitable for display by the target device."

Generating the transformed document produces a useful, concrete and tangible result in that the

transformed document is suitable for display on the target device. Accordingly, claim 11 is

directed to patentable subject matter at least because it is directed to a system that transforms

data producing a useful, concrete and tangible result.

The Examiner points to a statement in the specification, at page 10, lines 10-12, in

support of the assertion that the claim could be "implemented in software alone" and therefore is

not "tangibly embodied." However, when considering the claim as a whole, it is clear that the

claim can not be implemented in software alone, as the Examiner asserts. Claim 11 is directed to

a system that includes several modules, namely, a parsing module, a style sheet access module, a

style sheet application module, and a flattening module. The claim does not merely list various

software modules, but rather limits each of these modules to certain configurations that perform

11

specific tasks. For example, the claim 11 requires the parsing module to be "configured to parse

the document to generate therefrom a corresponding document object model (DOM)." As

another example, claim 11 requires the flattening module to be "configured to flatten the DOM

to generate therefrom a corresponding transformed document suitable for display by the target

device." The Examiner, in citing to page 10, lines 10-12 of the specification in support of the

assertion that the apparatus of claim 11 could be implemented in software alone, appears to rely

on the discussion in the specification of a "module." However, it is respectfully submitted that

the Examiner ignores the limitations of the claim as well as disclosure in the specification that

contradicts the position that the claim could be implemented in software alone.

Contrary to the statement in the *Office Action*, claim 11 cannot be "implemented in

software alone." Although the specification states, at page 10, lines 10-12, that "modules may be

implemented as software, hardware, firmware, or any combination thereof," the very next

sentence states that "[f]or example, as used herein, a module may include any type of computer

instruction or computer executable code located within a memory device and/or transmitted as

electronic signals over a system bus or network." Claim 11 does not recite only "modules"

without further limitation, but rather recites modules that are configured to perform specific

tasks. Claim 11 limits the "parsing module," for example, to a configuration that "parse[s] the

document to generate therefrom a corresponding document object module (DOM) including at

least one object." Assuming an embodiment of the parsing module is implemented in software,

such a parsing module is not configured to parse the document to generate a corresponding DOM

until that software is installed into a computer implemented device, such as a computer readable

memory device, as discussed in the specification at page 10, line 13 through page 11, line 13.

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

Accordingly, it is respectfully submitted that embodiments of claim 11 that involve software instructions require more than just instructions, as the claim requires specific configurations of various modules that must be tangibly embodied in a computer memory, for example, to produce the useful, concrete and tangible results recited in the claim.

The Board is respectfully requested to reverse the rejection of claim 11 under 35 U.S.C. §101 for at least these reasons.

2. Rejection Under 35 U.S.C. §103(a)

As indicated above, the Examiner has rejected all of the pending claims, including independent claims 1, 11 and 21, as allegedly being unpatentable over *Intro to CSS2* in view of *Traughber*.

The Applied References

Intro to CSS2 discloses, in section 2.3 entitled "The CSS2 processing model," that a "user agent" (*i.e.*, a client application): (1) parses the source document and creates a document tree; (2) identifies the media type; (3) retrieves style sheets; (4) annotates elements of the document tree; (5) generates a formatting structure; and (6) transfers the formatting structure to the target medium.

Thus, *Intro to CSS2* discloses a system wherein a client computer applies style sheets to a parsed source document, which is similar to the deficient "relevant technology" discussed above. Accordingly, the system disclosed in *Intro to CSS2* would suffer from the same problems as the "relevant technology" of the Application, *i.e.*, many "user agents" (*i.e.*, web browsers) do not support style sheets.

Traughber discloses a processing engine used in the dynamic generation of HTML pages

provided by a web server. *See* Abstract. The Examiner relies on *Traughber* for allegedly

teaching "that customizing the requested documents was done on the server side (Page 2, lines 3-

14)(Fig. 2:32)." (O.A., pg. 3). The cited portion of *Traughber* discloses a Web Server that, in

response to receiving a request for an HTML page, invokes a processing engine that retrieves a

template and referenced external data. *Id.* *Traughber* further discloses that the processing

engine "creates a new HTML page from the template and embeds the resulting information into

the new HTML page and returns the resulting HTML page to the Web Server for presentation to

the user through a Web Browser." *Id.*

The Current Rejection

In the Final *Office Action*, it is alleged that *Intro to CSS2* (also referred to in the *Office

Action* as "W3C") discloses all of the features recited in independent claims 1, 11 and 21, except

for the feature: (A) that "customizing a requested document is done on the server side" (*O.A.*, pg.

3); and (B) of flattening the DOM to generate the transformed document. (*O.A.*, pg. 4).

Appellant agrees that *Intro to CSS2* is deficient, <u>at least</u> in these aspects.

Nevertheless, in an attempt to show that feature (A) was known, the Examiner applies

Traughber, taking the position that this reference teaches "that customizing the requested

document was done on the server side (Page 2, lines 3-14)(Fig. 2:32)." (*O.A.*, pg. 3). Further,

the Examiner alleges that "it would have been obvious to one of ordinary skill in the art, to have

customized a requested HTML document for [a] target device on the server side as shown in

Traughber, because Traughber teaches it was notoriously well known in the art at the time of the

invention for servers to customize documents to be sent to user agent web browsers (Page 2,

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

lines 3-14)(Abstract)(Fig. 2:32)" (*O.A.*, pg. 3). Still further, the Examiner asserts that to have

customized the HTML document for a target device on the server side would "provide the well

known benefit of reducing the processing load on the client side by processing the document on

the server-side." *Id.* Even further, the Examiner asserts that "it was also notoriously well known

in the art at the time of the invention for servers to customize documents to be sent to clients for

the purpose of advertisements or display capabilities by passing cookie data (user preferences)

from the client to the server so the server could better deliver user preferred customized data."

(O.A., pgs. 3-4).

Further, in an attempt to show that feature (B) was known, the Examiner asserts "that

'flattening' was well know in the art and thus would have been obvious (page 16, lines 15-19)."

Id. Further, the Examiner asserts, without support, that the claimed "flattening" process "would

have been equivalent [sic, to] displaying the formatting structure on the target medium display

(Section: 2.3 The CSS2 processing model: Step 6)." *Id.*

The Combination Does Not Teach Or Suggest All Of The Claim Elements

Appellant respectfully submits that the rejection of claims 1-30 in the *Office Action* does

not establish a *prima facie* obviousness rejection because the applied references fail to teach or

suggest all of the elements of the independent claims. Specifically, *Intro to CSS2* and

Traughber, either alone or in combination, fail to teach or suggest independent claim 1's

recitations[3] of: (A) applying "at least one rule of the style sheet to the DOM" in a document

server, where the style sheet rule is directed to a target device; and (2) "flattening the DOM to

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[3] Independent claims 11 and 21 recite similar features.

generate therefrom a corresponding transformed document suitable for display by the target

device."

Specifically, regarding feature (A), the only teaching or suggestion of the use of style

sheets for a target device in either reference is in *Intro to CSS2*, which discloses the use of style

sheets at the <u>client side</u>. *Intro to CSS2* does not teach or suggest the use of style sheets at the

<u>server side</u>.[4] *Traughber* fails to even acknowledge that style sheets exist, let alone teach or

suggest their application on <u>either</u> a client or server side. Thus, the only teaching or suggestion

of the use of style sheets in either reference is *Intro to CSS2's* specific indication that they be

applied on the <u>client side</u>.

Thus, clearly, neither reference teaches or suggests the use of style sheets at a server side,

and, even if the references could be combined as alleged by the Examiner, the combination

would still be missing this feature.

Additionally, regarding feature (B), the Examiner merely asserts (as noted above),

without support, that the claimed "flattening" of the DOM "would have been equivalent to

displaying the formatting structure on the target medium display (Section: 2.3 The CSS2

processing model: Step 6)." (O.A., pg. 4).

However, neither *Intro to CSS2* nor *Traughber* disclose flattening a DOM. Specifically,

the cited Step 6 of *Intro to CSS2* merely discloses "Transfer the formatting structure to the target

medium (e.g., print the results, display them on the screen, render them as speech, etc.)." This

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[4] The Examiner seems to understand this deficiency, as he concedes that: (1) *Intro to CSS2* fails to teach or suggest
"that customizing a requested document is done on the server side" (*O.A.*, p. 3 and p. 6); and (2) therefore, *Intro
to CSS2* "alone lacks a proper motivation to customize documents on a document server instead of a client
system" (*O.A.*, p. 6).

disclosure makes <u>no mention</u> of flattening the DOM therein. Further, *Intro to CSS2* discloses that the "formatting structure" often closely resembles the document tree, and hence, is <u>not</u> flattened. However, even if the formatting structure does not closely resemble the document tree, *Intro to CSS2* does not disclose that the formatting structure has undergone a flattening process (as noted above). Thus, even if the teachings of *Intro to CSS2* were modified based on *Traughber* to operate on a server side, all the limitations of the claims would not be met since the combination would not flatten a DOM.

Further, to the extent that the Examiner seems to be relying on features discussed in the instant Application itself, the Examiner has identified no particular reason why *Intro to CSS2* would be modified to include the DOM flattening step mentioned therein.

Accordingly, Applicants respectfully submit that the Examiner has not set out a *prima facie* case of obviousness for at least these reasons.

The Prior Art Does Not Supply The Motivation To Combine The References

Appellant also respectfully submits that the rejection of claims 1-30 in the *Office Action* does not establish a *prima facie* obviousness rejection because the Examiner has not established the requisite motivation to combine the references as he alleges. Specifically, the Examiner has not identified any particular reason, supported by the applied references, <u>why</u> one of ordinary skill in the art at the time of the invention (hereinafter "one of skill") would have been motivated to change *Intro to CSS2*'s client side application of style sheets to a modified system where style sheets are applied at a server side, in view of some disclosure in *Traughber*.[5]

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[5] The Examiner must "show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for a
...(footnote continued)

In this regard, Appellant respectfully submits that the Examiner has failed to provide any

such motivation, as the Examiner does not allege (and indeed cannot allege) that *Traughber*

specifically discloses any particular application of style sheets at either the client or server side,

let alone any reason why the application of style sheets should occur on the server side. Rather,

the Examiner only generally alleges that *Traughber* provides the requisite motivation in view of

its alleged disclosure "that customizing the requested document can be done on the server side

(Page 2, lines 3-14)(Fig. 2: 32)" (*O.A.*, pg. 3).

However, Appellant respectfully submits that, even if *Traughber* could be read as

generally disclosing server side processing of web pages as the Examiner alleges, such general

processing of web pages on a server is not relevant to the application of style sheets, as style

sheets are a specific technique for dynamically customizing a web page for different display

devices. *Traughber* does not even recognize that its HTML page can be modified for different

display devices, let alone teach or suggest anything regarding the application of style sheets for

such a purpose on either the client or server side.

Thus, since *Intro to CSS2* specifically discloses the benefits of applying style sheets at the

client side, and since *Traughber* does not disclose any particular reason to modify *Intro to*

CSS2's clear disclosure, Applicant respectfully submits that *prima facie* obviousness has not

been established.

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combination in the manner claimed." *In re Rouffet*, 47 USPQ2d 1453 (Fed.Cir. 1998). The mere fact that
references can be "combined or modified does not render the resultant combination [or modification] obvious
unless the prior art also suggests the desirability of the combination [or modification]." *In re Mills*, 916 F.2d 680
(Fed.Cir. 1990); MPEP §2143.01.

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

Further, as to alleged reasons which the Examiner offers in support of his proffered

modification of *Intro to CSS2* in view of *Traughber*, *i.e.*,: (1) that such a modification "would

provide the well known benefit of reducing the processing load on the client side;" and (2) that

"[i]t was notoriously well known … for servers to customize documents to be sent to clients for

the purpose of advertisements or display capabilities by passing cookie data … from the client to

the server," neither is supported anywhere in the applied references (or even alleged to be

supported in either reference by the Examiner). Accordingly, these reasons cannot be used in

support of the instant rejection.

VII.　CONCLUSION

In view of the subject matter recited in claim 11 and the foregoing differences between appealed claims 1-30 and the cited references, the Appellant respectfully submits that appealed claim 11 is directed to patentable subject matter and appealed claims 1-30 are patentable over *Intro to CSS2*, *Traughber* or any reasonable combination thereof. Thus, claims 1-30 are believed to be allowable and the Board is respectfully requested to reverse the rejections set out in the Final *Office Action*.

Unless a check is submitted herewith for the fee required under 37 C.F.R. §41.37 and 1.17(c), please charge said fee to Deposit Account No. 19-4880.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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23373
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Date:　March 20, 2006

CLAIMS APPENDIX

CLAIMS 1-30 ON APPEAL:

1. (Original) Within a document server, a computer-implemented method for customizing a requested document comprising at least one hypertext markup language (HTML) element, the method comprising:

parsing the document to generate therefrom a corresponding document object model (DOM) including at least one object;

obtaining a style sheet including at least one rule directed to a target device;

applying the at least one rule of the style sheet to the DOM; and

flattening the DOM to generate therefrom a corresponding transformed document suitable for display by the target device.

2. (Original) The method of claim 1, wherein the style sheet comprises a cascading style sheet (CSS).

3. (Original) The method of claim 1, wherein the obtaining step comprises:

identifying a target device for displaying the document; and

identifying at least one rule of a style sheet directed to the identified target device.

4. (Original) The method of claim 3, further comprising:

receiving a request for a document from a client program.

5. (Original) The method of claim 4, wherein the client program comprises a Web browser.

6. (Original) The method of claim 1, wherein the style sheet includes rules directed to at least two different target devices.

7. (Original) The method of claim 1, wherein the style sheet is stored within a separate portion of the document.

8. (Original) The method of claim 1, wherein the style sheet and the document are stored as logically separate data files.

9. (Original) The method of claim 1, further comprising:

transmitting the transformed document to a client program.

10. (Original) The method of claim 1, the transforming step comprising:

removing at least one object of the DOM in response to an indication within the style sheet to remove a corresponding HTML element from the document.

11. (Previously Presented) A system for customizing a requested document for sending to a target device comprising at least one hypertext markup language (HTML) element, the system comprising:

a parsing module configured to parse the document to generate therefrom a corresponding document object model (DOM) including at least one object;

a style sheet access module configured to obtain a style sheet including at least one rule directed to the target device;

a style sheet application module configured to apply the at least one rule of the style sheet to the DOM; and

a flattening module configured to flatten the DOM to generate therefrom a corresponding transformed document suitable for display by the target device.

12. (Original) The system of claim 11, wherein the style sheet comprises a cascading style sheet (CSS).

13. (Original) The system of claim 11, wherein the style sheet access module comprises:

a target device identification module configured to identify a target device for displaying the document; and

a style sheet identification module configured to identify at least one rule within a style sheet directed to the identified target device.

14. (Original) The system of claim 13, further comprising:

a request reception module configured to receive a request for a document from a client program.

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

15. (Original) The system of claim 14, wherein the client program comprises a Web browser.

16. (Original) The system of claim 11, wherein the style sheet includes rules directed to at least two different target devices.

17. (Original) The system of claim 11, wherein the style sheet is stored within a separate portion of the document.

18. (Original) The system of claim 11, wherein the style sheet and the document are stored as logically separate data files.

19. (Original) The system of claim 11, further comprising:

a transmission module configured to transmit the transformed document to a client program.

20. (Original) The system of claim 11, wherein the style sheet application module comprises:

an object removal module configured to remove at least one object of the DOM in response to an indication within the style sheet to remove a corresponding HTML element from the document.

21. (Previously Presented) An article of manufacture comprising a program storage medium readable by a processor and embodying one or more instructions executable by the processor to perform a computer-implemented method for customizing a requested document for sending to a target device comprising at least one hypertext markup language (HTML) element, the method comprising:

parsing the document to generate therefrom a corresponding document object model (DOM) including at least one object;

obtaining a style sheet including at least one rule directed to a the target device;

applying the at least one rule of the style sheet to the DOM; and

flattening the DOM to generate therefrom a corresponding transformed document suitable for display by the target device.

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

22. (Original) The article of manufacture of claim 21, wherein the style sheet comprises a cascading style sheet (CSS).

23. (Original) The article of manufacture of claim 21, wherein the obtaining step comprises:

identifying a target device for displaying the document; and

identifying at least one rule of a style sheet directed to the identified target device.

24. (Original) The article of manufacture of claim 23, the method further comprising: receiving a request for a document from a client program.

25. (Original) The article of manufacture of claim 24, wherein the client program comprises a Web browser.

26. (Original) The article of manufacture of claim 21, wherein the style sheet includes rules directed to at least two different target devices.

27. (Original) The article of manufacture of claim 21, wherein the style sheet is stored within a separate portion of the document.

28. (Original) The article of manufacture of claim 21, wherein the style sheet and the document are stored as logically separate data files.

29. (Original) The article of manufacture of claim 21, the method further comprising:

transmitting the transformed document to a client program.

30. (Original) The article of manufacture of claim 21, the transforming step comprising:

removing at least one object of the DOM in response to an indication within the style sheet to remove a corresponding HTML element from the document.

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

EVIDENCE APPENDIX

N/A

Appeal Brief Under 37 C.F.R. § 41.37
U.S. Appln. No.: 09/512,560

Attorney Docket # A8643 /
ST9-99-153

RELATED PROCEEDINGS APPENDIX

N/A